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5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
10 LITIGATION

Case No. 23-md-03084-CRB

11 This Document Relates to:
12 ALL CASES
13

**AFFIDAVIT OF TIFFANY R. ELLIS IN
SUPPORT OF PLAINTIFFS' LIST OF
DISPUTED ENTRIES FOR SPECIAL
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for
6 Special Master Review on April 24, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for
8 Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries
10 was challenged. The Brief included the general background of the privilege dispute process to
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a
12 general argument for the challenges Plaintiffs raised.

13 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on
14 April 24, 2025 contained an entry still in dispute for custodian Jill Hazelbaker.

15 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on
16 April 24, 2025 did not contain any entries for the custodians that overlapped with custodians
17 already submitted to the Special Master for review.

18 **Jill Hazelbaker**

19 6. Defendants included approximately 1,071 entries for Jill Hazelbaker across its
20 Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.

21 7. Plaintiffs originally challenged approximately 831 of these 1,071 entries.

22 8. As of January 31, 2025¹, Defendants withdrew their claim of privilege to 103
23 entries in full and 218 entries in part.

24 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log
25 after Defendants re-reviewed all entries in dispute pursuant to Master Order No. 2. Defendants
26 withdrew their claim of privilege to 349 entries in full and 258 entries in part.

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28 ¹ Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log
Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2.
See ECF No. 2357.

1 10. Defendants provided Plaintiffs with a revised Privilege Log on April 21, 2025. In
2 total, to date, Defendants logged 1,258 entries for Jill Hazelbaker and have withdrawn their claim
3 of privilege to approximately 360 entries in full and 275 entries in part.

4 11. On March 25, 2025, Plaintiffs provided the Special Master and Defendants with a
5 list of 20 entries in dispute for Jill Hazelbaker following a review of Uber's revised privilege log
6 that included updated or additional information provided by Uber, documents produced with
7 redactions, or lessons learned from Judge Cisneros' privilege orders and Defendants' newer
8 privilege log.

9 12. On April 17, 2025, Plaintiffs provided the Special Master and Defendants with a
10 supplemental list of 8 entries for Jill Hazelbaker from Defendants' Marh 24, 2025, April 1, 2025,
11 April 8, 2025, April 11, 2025, and April 16, 2025 privilege logs.

12 13. On April 23, 2025, Defendants provided written response to Plaintiffs' list and the
13 parties met and conferred. During the meet and confer process, Defendants informed Plaintiffs
14 that they withdrew their claim to 5 entries in full and 4 entries in part since the submission on
15 March 25, 2025. Additionally, Defendants represented that they would withdraw their privilege
16 claim to 2 more entries in full and 4 more entries in part.

17 14. On April 24, 2025 Plaintiffs provided the Special Master and Defendants with a
18 list of 12 entries that remains in dispute for Jill Hazelbaker.

19 Executed this 28th day of April, 2025 in **San Francisco, CA.**

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21 /s/ Tiffany R. Ellis
22 Tiffany R. Ellis